



THE PLAN FOR STAFFORD BOROUGH - EXAMINATION IN PUBLIC
23rd OCT – 1st NOV 2013

3 DEVELOPMENT STRATEGY (SPATIAL PRINCIPLES SP1-SP7)

Key Issue:-

Is the development strategy for Stafford Borough soundly based, effective, appropriate, locally distinctive and justified by robust, proportionate and credible evidence, particularly in terms of delivering the proposed amount of housing, employment and other development, and it is positively prepared and consistent with national policy?

- 1 **Introduction** – Paul Sharpe Associates LLP act on behalf of Fradley Estates Limited (FEL), the developer in the 1980's of the Aston Lodge Park neighbourhood on the east side of Stone. Some 6ha of undeveloped land fronting Uttoxeter Road adjacent to the original allocation is not designated for its landscape, heritage, wildlife or Green Belt qualities and all necessary infrastructure is available with adequate spare capacity. The site is suitable, available and viable to provide about 100 dwellings contributing to housing supply (SHLAA ref 269).
- 2 Importantly, the TA prepared by BSP Consulting and submitted in response to the Draft Publication concludes that a strategic development of about 100 dwellings would not be unacceptably constrained by the presence of the West Coast Mainline or by the junction of Uttoxeter Road and Lichfield Road.
- 3 Put simply, FEL seek an increase in overall housing provision; an increase in housing provision at Stone; removal of the artificial planning constraints on housing provision at Stone and identification of SHLAA site reference 269 as a strategic development location.

3.2 SPATIAL PRINCIPLE 2

- 4 **(i)** The development strategy is not positively prepared; does not reflect the status of Stafford as a growth point and fails to boost significantly housing provision as required by NPPF (para 47). The housing provision target is distinctly unambitious.
- 5 In paras 6.9 and 6.10 the Council identifies an historic completion rate of 454 dpa. However, this includes the abnormal years 2009-2012 following the economic recession. If that period is excluded, the completion rate 01/02 – 08/09 is 520 dpa. Consequently, the planned 500 dpa constitutes, at best, "more of the same" and, at worst, a reduction in planned housing provision. This is neither consistent with the "growth point" concept nor will it boost housing supply.
- 6 In the build up to the chosen strategy, in Strategic Policy Choices, the Council implied that a strategy of least resistance (500 dpa) was more likely to lead to early adoption of the Plan. In our view, this is not a good reason for adopting this strategy.
- 7 **(ii)** On the basis of the Council's very conservative (negative) housing target, 5, 10, 15 year housing land supply horizons are relatively easy to achieve. Adequate sites can be identified from the SHLAA and the three strategic development locations at Stafford and one at Stone should be capable of delivering this unambitious target. On the other hand, if the target were to be increased, say to 600 or so dpa, then the artificial constraint on housing development in Stone should be abandoned and the overall target for Stone increased. Also, some of the currently intended rural housing provision should, in our view, be redirected to a more sustainable location such as Stone.



- 8 **(iii)** From the literature, it appears that the Council's housing land supply calculation includes a 20% buffer and a 10% wastage allowance because it appears that, on a regular basis, only 90% of the commitments are actually constructed. No attempt has been made to make up for past shortfalls in housing delivery, particularly during the recent economic recession. The often made comment by the Council that housing land supply is easily met over the Plan period reflects the Council's low ambition and reduced housing target.
- 9 **(iv)** The Council has, of course, considered alternative levels of housing development at 250 dpa and 750 dpa. These alternatives are, in themselves, highly unrealistic and were, in our view, a cynical ploy by the Council to bolster its preferred level of 500 dpa. As indicated previously, this level of housing development is merely "more of the same"; does not reflect the growth point concept and will not deliver a significant boost to housing supply in Stafford Borough.
- 10 Our cynicism is evidenced by the Council's view that a 500 dpa target may be the quickest way to get the Plan adopted (Stafford having the dubious distinction of having one of the first Core Strategies in the UK to be found unsound).
- 11 **(b)(i) – (iii)** It appears that employment land provision is based on a review of past trends in the take up of employment land; forecasts of labour supply and an attempt (claimed) to deliver a balanced site portfolio.
- 12 In our view, there is little or no integration between employment and housing targets. It is essential that targets are aligned and integrated such that employment land provision is no longer the Cinderella subject in development plans.
- 13 Economic growth assumptions need to be based on an analysis of growth potential (say) by economic sector rather than a crude land availability conversion factor or projection of past trends. This is particularly important in Stafford where, with its high proportion of public sector employment, there is a need to diversify the employment base in the light of the likely effects of public sector spending cuts.
- 14 On behalf of Stan Robinson (Stafford) Limited we would point out to the Inspector a particular issue regarding the contribution of land owned by the company (6 ha) at Ladfordfields and proposed for allocation under Policy E4.
- 15 Ladfordfields Industrial Estate is a well established industrial estate with a range of employers serving the employment needs of part of the rural area of the Borough west of, and with good access, to the M6.
- 16 Stan Robinson (Stafford) Limited occupies about 70% of the area of the estate but the estate is now fully developed.
- 17 Stan Robinson (Stafford) Limited is a logistics company and one of the largest employers in Stafford. About 240 people are employed at Ladfordfields with a total of 345 people nationally. Ladfordfields is the focus of the company's UK operation with specialist warehouse facilities built to accommodate the complete outsourced logistics functions of household named companies such as Bostik, Evo-stik and Wickes.
- 18 The company continues to expand at Ladfordfields. Much of the land now allocated for employment use is set to accommodate those expansion needs. While speculative employment development is not ruled out, in the main, the land is required to accommodate the expansion needs of the company.



- 19 Consequently, in employment land terms, the expansion land at Ladfordfields (6ha) would not generally be available to the market and therefore due allowance of this fact should be made when assessing overall employment land needs.
- 20 **(c)** In our view, SP2 does not appropriately address cross boundary housing and employment issues. Excessive weight appears to have been given to regeneration issues in the North Staffordshire Conurbation when there is no evidence to suggest that past development in Stafford Borough has prejudiced development in that conurbation.
- 21 The Growth Point at Stafford will draw in development potential from the West Midlands Conurbation and from the Potteries Conurbation. Whilst the two Green Belts will work to focus development into regeneration within their areas of influence, the Growth Point potential at Stafford will inevitably draw from both conurbations.
- 22 Consequently, for as long as Stafford remains a Growth Point there is no logic in artificially suppressing the sustainable development potential of Stone. If development investment potential is going to leap frog the Green Belt then it is logical to direct that investment to Stafford and to Stone - the most sustainable locations – rather than to Stafford and to rural settlements, particularly those rural settlements located within the Green Belt.
- 3.3 SPATIAL PRINCIPLES 3, 4 & 5**
- 23 **(a)** We take no issue with the settlement hierarchy per se. Our objection is to the future role of Stone, ie the second most sustainable location in the Borough. The town is to be passed over in favour of a geographically dispersed and unsustainable distribution of housing in Key Service Villages and the Rest of the Rural Area.
- 24 The inference that the phasing of new housing and employment development at Stone post 2021 will provide an opportunity to irrevocably resolve the regeneration problems of the Potteries Conurbation is, frankly, naive. No evidence has been produced to support this notion and this draconian measure is, in our view, unrealistic and not soundly based.
- 25 **(b)** In our view the distribution of housing within the hierarchy in SP4 is illogical; runs counter to the principles of sustainable development and, in our view, is verging on the perverse.
- 26 Summarising, previous housing policies have seen Stone delivering on suppressed housing targets; Stafford on the other hand has under-performed, while key villages and the rural area have been out of control and have seen significant housing numbers delivered in the least sustainable locations.
- 27 Now, the Council's preferred approach would see housing provision in Stone suppressed further while the key villages are to be artificially stimulated by re-drawing RDB's in order to attract even more unsustainable housing development. In our view this approach is clearly a recipe for unsustainable development.
- 28 What further compounds the illogical approach is an acknowledgement that there is insufficient capacity within the village RDB's and that those RDB's will have to be expanded to accommodate the planned growth. Clearly a greenfield extension at Stone is, by definition, more sustainable than a greenfield extension at a rural village.
- 29 Furthermore, with relatively smaller scale sites in the Key Service Villages and Rural Area, there will be less potential to deliver affordable housing than at larger sites at Stone.



- 30 In accordance with the principles of sustainable development, in our view, the proportion of housing provision assigned to Stone must be greater than that assigned to the lower order tiers of the hierarchy.
- 31 Policies must give priority to sustainable locations. Artificially suppressing provision in Stone in favour of more dispersed, less sustainable locations with reduced potential for affordable housing does not provide the required priority. Accordingly, consistent with the principles of sustainable development we suggest the following distribution of housing in the Borough over the Plan period:-
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|----------------------|-----|
| Stafford | 72% |
| Stone | 17% |
| Key Service Villages | 6% |
| Rest of rural area | 5% |
- 32 **The moratorium period** is in our view unworkable. Note this “policy” is buried in the reasoned justification in para 6.49. Such an approach has echoes of Category D village policies in County Durham in the 1960’s, those policies only to be scrapped in the 1970’s because they were simply unworkable.
- 33 Stafford Borough has had its own experience of unworkable “moratoria”. In the 1970’s and 80’s the Borough had six statutory Local Plans, ie for Stafford, for Stone, and one each for the four geographic quarters of the District. In the latter four plans a strict housing quota was established (following public inquiry) for each Plan period. In some villages no housing was allowed and, when the quota was used up, no further permissions were to be given. Notwithstanding the statutory status of those policies, S78 Inspectors faced with development proposals that were entirely acceptable in all respects save for exceeding the quota, time and again granted planning permission, ie the policy was unworkable.
- 34 Consequently, in our view, the suggested moratorium as well as the deferment of development at Stone until after 2021 is simply unworkable.
- 35 **(c)** – In large part, our comments regarding employment growth have been set out in response to 3.3 (b) and (c) above. We reiterate that proposals for expansion at Ladfordfields Industrial Estate is, in the main, dedicated to the expansion needs of a single large company, ie Stan Robinson (Stafford) Limited and that as a consequence the 6 ha of land available should not be viewed as contributing to employment land supply over the Plan period.
- 36 If part were to be developed for speculative purposes then this should be viewed as a bonus to employment land supply. This approach would provide the company with the sort of flexibility in its business activities which is required by the NPPF and referred to in para 3.6a of the Inspector’s Issues for Examination Schedule.
- 3.4a SPATIAL PRINCIPLE 6**
- 37 Fradley Estates Limited (FEL) raise no issue with the objective of seeking to achieve rural sustainability as far as reasonably practical (ie in the sense advocated in para 2.8 of NPPF) and most of the principles set out are unobjectionable.
- 38 However, FEL reiterate that the allocation of such a large proportion of new housing provision (20%) to Key Service Villages and the Rest of the Rural Area whilst, in effect, ignoring Stone, (the second most sustainable location in the Borough) is fundamentally unsustainable.



- 39 By promoting 20% of new housing development on greenfield sites in Key Service Villages (generally there are few, if any, brownfield sites within existing RDB's) the Council is positively promoting unsustainable development.
- 40 SP6 suggests that rural sustainability will be achieved by (a) "protecting environmental assets" and (b) "sustaining the social and economic fabric of communities". However, the key issue in rural communities is **transport**; either the lack of it or its cost.
- 41 No self respecting policy claiming to achieve rural sustainability can ignore the need to address, explicitly, transport issues, particularly public transport and its cost.
- 42 Whilst the support given to Recognised Industrial Estates assists in supporting and diversifying the rural economy and reducing journey lengths, any dispersed rural housing development strategy must, in our view, address explicitly the transport issue with some sort of initiative to underpin and mitigate an otherwise inherently unsustainable policy.

3.5 SPATIAL PRINCIPLE 7

- 43 (a) Again, FEL's comment on the appropriateness of the RDB/Neighbourhood Plan/Site Allocations DPD approach to housing development is made without prejudice to the company's view that the proportionate distribution of housing provision within the settlement hierarchy (20% to Key Service Villages and Rural Area) is fundamentally misconceived and unsound.
- 44 Firstly, the record shows that housing development in the rural parts of the Borough (Key Service Villages and Rest of the Rural Area) despite the existence of "tight" restraint policies developed in the context of statutory local plans have failed to appropriately control housing development as completions have considerably exceeded planned provision.
- 45 The Inspector might note that in evolving the current 2001 Local Plan the Council first promoted a strategy similar to that now proposed with substantial quantities of housing distributed throughout the rural area. That approach was rejected by the Local Plan Inspector as unsustainable and the Council was required to fundamentally redraft its Local Plan. Clearly lessons have not been learned.
- 46 In our view, RDB's are the most effective way of delivering and controlling housing development in Key Service Villages. In those villages there are few, if any, brownfield opportunities. Greenfield sites will need to be identified and only by creating new limits to development can new development be adequately controlled.
- 47 RDB's could be defined either by an Allocations DPD or by a Neighbourhood Plan but in our view RDB's are a more straightforward construct; are reasonably well understood by the public and are more likely to provide the appropriate degree of control required than either land allocations or criteria based policies for Key Service Villages.
- 48 It goes without saying that the need to extend RDB's, in effect to stimulate unsustainable development in Key Service Villages in the rural area in preference to more sustainable locations such as Stone – is in our view perverse.
- 49 It appears the Council's intention is that development in the wider Rural Area should be very small in scale. As indicated above, this approach is even more liberal than that included in Statutory Local Plans in Stafford Borough in the 1970's and 80's when a strict prohibition on development within the Rural Area, with only minor infill development in some selected villages, proved ineffective. Now, the suggested alternative criteria based policies are likely, again, to lead to excessive unsustainable housing development in the rural area.